

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CENTRAL STATES, SOUTHEAST AND )  
SOUTHWEST AREAS PENSION FUND; )  
and CHARLES A. WHOBREY, as Trustee, )  
 )  
 ) Case No. 20 cv 4618  
 )  
 ) *Plaintiffs,* )  
 )  
 ) v. ) Judge John F. Kness  
 )  
 )  
 ) FCA US LLC, ) Magistrate Judge Maria Valdez  
 )  
 ) a Delaware limited liability company, )  
 )  
 )  
 ) *Defendant.* )

## **STIPULATION OF DISMISSAL**

NOW COME Plaintiffs and Defendant and each stipulate and agree pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure that this case be dismissed (a) with prejudice with respect to the claims for unpaid contributions for the period of January 1, 2012 through September 29, 2018, along with related interest, statutory damages, attorney's fees and costs, and audit fees and costs, and (b) without prejudice with respect to the claims for unpaid contributions for the period of September 30, 2018 through July 3, 2021, along with related interest, statutory damages, attorney's fees and costs, and audit fees and costs, in accordance with the Settlement Agreement and Release entered into and executed by the parties.

Respectfully submitted,

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November 3, 2021

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